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7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 BRIAN TERRANCE ALVAREZ-  
 10 GILBERG, an individual,

11 vs. Plaintiff,

12 GEICO CASUALTY COMPANY, a  
 13 foreign corporation; DOES I through X;  
 and ROE CORPORATIONS I through  
 X, inclusive,

14 Defendants.

Case No.: 2:20-CV-01583-RFB-VCF

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO CONTINUE  
 HEARING ON PLAINTIFF'S  
 MOTION TO COMPEL  
 DISCOVERY AND  
 DEFENDANT'S AMENDED  
 MOTION FOR PROTECTIVE  
 ORDER**

15 Plaintiff, Brian Terrance Alvarez-Gilberg, (hereinafter "Plaintiff"), by and  
 16 through his attorneys of record, CLAGGETT & SYKES LAW FIRM, and  
 17 Defendant Geico Casualty Company, ("Defendant"), by and through its  
 18 attorneys of record, McCORMICK, BARSTOW, SHEPPARD, WAYTE &  
 19 CARRUTH LLP., hereby stipulate and request an order continuing the Hearing  
 20 on Plaintiff's Motion to Compel Discovery [Doc. No. 40] and Defendant's  
 21 Amended Motion for Protective Order [Doc. No. 42] currently scheduled for June  
 22 6, 2022 [Doc. No. 54]. Plaintiff served an Amended Notice of 30(b)(6) Deposition  
 23 on May 26, 2022 including additional topics that Defendant wishes to object to

1 and seek to protect. The parties met and conferred and now propose that they  
2 each be allowed to file a supplemental brief, in connection with Defendant's  
3 Motion to Protect, dealing only with the new 30(b)(6) topics. The proposed  
4 supplemental briefs will be filed on June 6, 2022.

5 Based on the foregoing, the parties respectfully request that the hearing  
6 be continued to the next available date convenient to the Court after June 13,  
7 2022.

8 DATED this 26<sup>th</sup> day of May 2022.

9 CLAGGETT & SYKES LAW FIRM

11 /s/ Sean Claggett

12 Sean Claggett  
13 Nevada Bar No. 8407  
13 Attorneys for Plaintiff

DATED this 26<sup>th</sup> day of May 2022.

McCORMICK, BARSTOW,  
SHEPPARD, WAYTE & CARRUTH  
LLP

/s/ Jonathan Carlson

Jonathan Carlson  
Nevada Bar No. 10536  
Attorneys for Defendant

14 **ORDER**

15 IT IS HEREBY ORDERED that the hearing on Plaintiff's Motion to  
16 Compel Discovery [Doc. No. 40] and Defendant's Amended Motion for Protective  
17 Order [Doc. No. 42] currently set for June 6, 2022 [Doc. No. 54], be rescheduled  
18 to the next available date convenient to the Court after June 13, 2022.

19 DATED this 27th day of May 2022.

20  
21 IT IS HEREBY ORDERED  
22 that the video conference  
23 hearing scheduled for June 3,  
2022, is RESCHEDULED to a  
video conference hearing on  
June 15, 2022 at 10:00 AM.

24   
UNITED STATES MAGISTRATE JUDGE